

*USA HAO*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8751

UNITED STATES OF AMERICA,

Plaintiff,

v.

Elizabeth GONZALEZ-Garcia,

Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960

Importation of a Controlled Substance  
(Felony)


The undersigned complainant being duly sworn states:

That on or about August 19, 2008, within the Southern District of California, defendant Elizabeth GONZALEZ-Garcia, did knowingly and intentionally import approximately 64.40 kilograms (141.68 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Special Agent  
Immigration and Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE THIS 20th  
DAY OF AUGUST, 2008.

  
PETER C. LEWIS  
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA  
2 v.  
3 Elizabeth GONZALEZ-Garcia

4 STATEMENT OF FACTS

5 This complaint is based on the personal observations,  
6 investigation, and information furnished to Bureau of Immigration  
7 and Customs Enforcement Special Agent Christina Johnson.

8 On August 19, 2008, at approximately 1957 hours, Elizabeth  
9 GONZALEZ-Garcia (GONZALEZ) entered the United States from the  
10 Republic of Mexico at the Calexico, CA, West Port of Entry.  
11 GONZALEZ was the driver of a white 1995 Dodge Ram truck.

12 Primary Customs and Border Protection (CBP) Officer A.  
13 Arguilez received a negative Customs declaration from GONZALEZ.  
14 While conducting an inspection of the vehicle, CBP Officer  
15 Arguilez noticed a strong fresh paint odor coming from the  
16 vehicle. CBP Officer Arguilez asked GONZALEZ if the vehicle had  
17 recently been painted and GONZALEZ said no. CBP Officer Arguilez  
18 asked GONZALEZ what she did for a living. GONZALEZ said she was  
19 going to Wal-mart in Calexico to buy groceries and things for her  
20 business. CBP Officer Arguilez tapped on the tires and noticed  
21 they sounded solid. CBP Officer Arguilez escorted the vehicle to  
22 the secondary lot for further inspection.

23 In secondary, the CBP Officer J. Kierepka inspected the  
24 tires and could not feel any vibration. A Narcotics Detector Dog  
25 alerted to the front driver side tire of the vehicle driven by  
26 GONZALEZ.

27 Packages were discovered inside all 4 tires of the vehicle.  
28 CBP Officer Kierepka removed one package. A presumptive field  
29

1 test indicated the contents of these packages to be marijuana.  
2 Forty-two (42) packages were discovered in all. The total weight  
3 of the packages was approximately 62.70 kilograms (141.68  
4 pounds).